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**MEMO ENDORSED**

August 11, 2021

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VIA ECF

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: ***United States v. Michael Rose, 21 Cr 224 (VEC)***

Dear Judge Caproni:

We represent defendant Michael Rose in the above-captioned matter. With the consent of the government, we write to request an approximately 30-day adjournment of the status conference currently scheduled for August 17, 2021, at 3:00 p.m.

The reason for the request is to enable counsel to continue conversations with the prosecutor about the charges.

In connection with this request, Mr. Rose and counsel agree to the exclusion of time under the Speedy Trial Act until the date set by the Court for the next conference.

Thank you for Your Honor's consideration.

Respectfully submitted,

/s/ M. Theodore Takougang

M. Theodore Takougang

cc: AUSA Samuel Adelsberg (via ECF)

Application DENIED.

SO ORDERED.



8/11/2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE